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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) Case No: CR 05 0254 CRB
14 Plaintiff,) **UNITED STATES' REQUEST AND**
15 v.) **[PROPOSED] ORDER FOR**
16 DERA MARIE JONES,) **ADDITIONAL TIME TO FILE**
a/k/a Derek Jones) **RESPONSE**
17 Defendant.) Next Date: April 5, 2005
Time: 2:15 p.m.
Court: Hon. Charles R. Breyer

19 The United States respectfully requests this Court for additional time within which
20 to file its response to the defendant's motion for a new trial filed on February 27, 2006.
The defendant's motion, filed approximately three months after she was convicted, is
lengthy and contains two declarations of fact, several transcript excerpts, and additional
exhibits all requiring significant review. The United States also makes this request in part
due to the need for continued research and expert consultation. Accordingly, the United
States requests an additional three weeks to respond to the defendant's motion for a new
trial.

27 Defense counsel, Elizabeth Falk of the Federal Public Defender's Office, is out of
28 the district until March 24, 2006, and is therefore unavailable. The duty Federal Public

1 Defender declined to state a position on this motion on her behalf.

2 Should the Court grant the motion for additional time, the proposed briefing
3 schedule would proceed with the United States' response due on April 12, 2006, the
4 defendant's reply (if any) due on April 19, 2006, and a motions hearing before the Court
5 on April 26, 2006 at 2:15PM.

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7 DATED: March 22, 2006 Respectfully submitted,

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9 KEVIN V. RYAN
United States Attorney

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11 /s _____
12 ROBERT DAVID REES
Assistant United States Attorney

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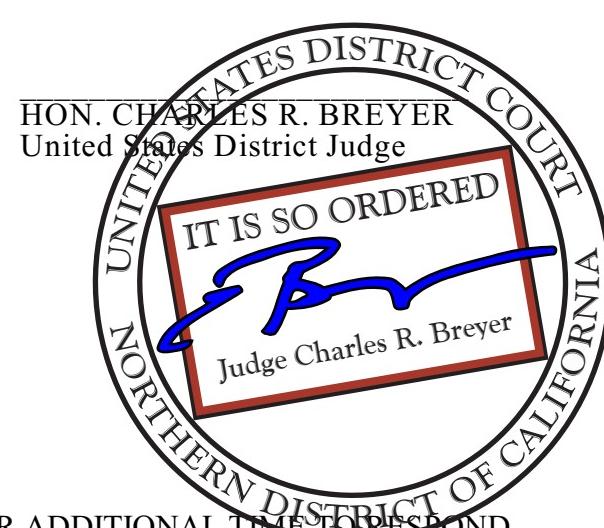
15 **[PROPOSED] ORDER**

16 For good cause shown, the briefing schedule for the defendant's Motion for a New
17 Trial shall be altered such that the United States' response is due on April 12, 2006 and
18 the defendant's reply (if any) is due on April 19, 2006. The Court vacates the current
19 hearing date of April 5, 2006, and instead will hold a hearing on the motion at 2:15PM on
20 April 26, 2006.

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23 DATED: March 23, 2006



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